

REMARKS

Regarding the Claim Amendments

Claims 23, 25, 27-33, 35, 37-42, and 44 are pending and under examination. By this Amendment, Applicant has amended claims 23 and 33. Support for the amendments can be found in the specification at, for example, p. 12, lines 6-20, p. 13, lines 12-14, and Figs. 3-6.

Regarding the Office Action

Applicant respectfully traverses the following rejections made in the Office Action:

- (a) rejection of claims 23, 25, 28-33, 35, 38-42 and 44 under 35 U.S.C. § 103(a) as being unpatentable over Parlay Web Services Overview, October 31, 2002, pp. 1-21 ("Overview") in view of Parlay Web Services Architecture Comparison, October 31, 2002, pp. 1-17 ("Comparison"), and further in view of WO 01/45049 A1 ("Grantges"); and
- (b) rejection of claims 27, 37, and 44 under 35 U.S.C. § 103(a) as being unpatentable over Overview in view of Comparison and Grantges, and in further view of Parlay Web Services Application Deployment Infrastructure, October 31, 2002, pp. 1-21 ("Deployment").

Regarding the Rejections under 35 U.S.C. § 103(a)

Applicant requests reconsideration and withdrawal of the rejections of claims 23, 25, 27-33, 35, 37-42, and 44 under 35 U.S.C. § 103(a) as being unpatentable over one or more of Overview, Comparison, Grantges, and Deployment.

The Office Action has not properly resolved the *Graham* factual inquiries, the proper resolution of which is the requirement for establishing a framework for an objective obviousness analysis. See M.P.E.P. § 2141(II), citing to *Graham v. John Deere Co.*, 383 U.S. 1, 148 USPQ 459 (1966), as reiterated by the U.S. Supreme Court in *KSR International Co. v. Teleflex Inc.*, 550 U.S. 398, 82 USPQ2d 1385 (2007).

In particular, the Office Action has not properly determined the scope and content of the prior art. Specifically, Overview, Comparison, Grantges, and Deployment, whether taken alone or in any combination, do not teach or suggest what the Office Action attributes to them. In addition, the Office Action has not properly ascertained the differences between the claimed invention and the prior art, at least because the Office Action has not properly interpreted the prior art and considered both the invention and the prior art as a whole. See M.P.E.P. § 2141(II)(B).

Amended independent claim 23 recites, among other things:

providing a set of modules separate from the Parlay gateway, the modules comprising service interfaces for said software applications and acting as proxies on behalf of said software applications to perform requests for access to web services on the framework of said Parlay gateway, wherein the modules are included in at least one of the one or more servers deployed in the domain of the telecommunication operator; and

configuring the modules in said set for performing authentication, authorization, and execution requests on said Parlay gateway on behalf of said software applications.

Overview, Comparison, Grantges, and Deployment, whether taken alone or in any combination, do not teach or suggest at least the above-quoted features recited in amended claim 23.

In rejecting claim 23, the Office Action alleges that Overview's p. 11, section 5.4 discloses "Parlay Web Services Gateway . . . providing a proxy function for the Parlay/OSA Framework capabilities that enable Web Services solutions to be deployed using intermediate servers." Office Action, p. 4. The alleged "proxy function for the Parlay/OSA Framework" disclosed in section 5.4 of Overview, however, is provided by the Parlay Web Services Gateway (see also Fig. 3 of Overview), and is not provided by

"a set of modules separate from the Parlay gateway" (emphasis added), as recited in amended claim 23.

Furthermore, Overview discloses that the Parlay Web Services Gateway performs authentication through the "Bind" operation for the Parlay Application, as shown in Fig. 6 of Overview. In contrast, claim 23 recites that "authentication, authorization, and execution requests on said Parlay gateway" are performed by the modules on behalf of the software applications, wherein the modules are "separate from the Parlay gateway." Therefore, Overview does not teach or suggest at least the above-quoted features recited in amended claim 23.

The Office Action admits that "Services Overview and Architecture do not explicitly disclose configuring the modules in said set for performing authentication, authorization, and execution requests on behalf of said software applications." Office Action, p. 5. The Office Action then relies on Grantges to allegedly cure the deficiencies of Overview and Comparison. Notwithstanding the Office Action's allegation regarding the teaching of Grantges, with which Applicant does not agree, Grantges does not teach or suggest, among other things, "providing a set of modules separate from the Parlay gateway . . . and acting as proxies on behalf of said software applications to perform requests for access to web services on the framework of said Parlay gateway," as recited in amended claim 23 (emphasis added). Therefore, Grantges does not cure the deficiencies of Overview and Comparison.

Likewise, Deployment does not teach or suggest, among other things, "providing a set of modules separate from the Parlay gateway . . . and acting as proxies on behalf of said software applications to perform requests for access to web services on the

framework of said Parlay gateway," as recited in amended claim 23 (emphasis added).

Therefore, Deployment does not cure the deficiencies of Overview and Comparison, and Grantges.

Therefore, Overview, Grantges, Comparison, and Deployment, whether taken alone or in combination, do not teach or suggest each and every feature of amended independent claim 23. Accordingly, independent claim 23 is nonobvious over the cited references and should be allowable. Although of different scope, independent claim 33, similarly amended, recites features similar to those recited in amended claim 23.

Therefore, independent claim 33 should also be allowable for at least the same reasons stated above with respect to independent claim 23. In addition, dependent claims 25, 27-32, 35, 37-42, and 44 also should be allowable at least by virtue of their respective dependence from base claim 23 or 33, and because they recite additional features not taught or suggested by the cited references. Applicant therefore respectfully requests withdrawal of the 35 U.S.C. § 103(a) rejections.

Conclusion

Applicant respectfully requests reconsideration of the application and withdrawal of the rejections. Pending claims 23, 25, 27-33, 35, 37-42, and 44 are in condition for allowance, and Applicant requests a favorable action.

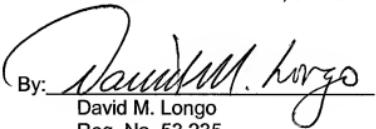
The Office Action contains a number of statements reflecting characterizations of the cited art and the claims. Regardless of whether any such statements are identified herein, Applicant declines to automatically subscribe to any such statements or characterizations.

Please grant any extensions of time required to enter this response and charge
any additional required fees to Deposit Account 06-0916.

Respectfully submitted,

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